



Solutia Inc.
J. F. Queeny Plant
201 Russell Blvd.
St. Louis, Missouri 63104
Tel 314-622-1400

Certified Mail – Return Receipt Requested

January 11, 2005

Certified Mail Receipt Number
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Mr. James Gulliford
Regional Administrator
U.S. Environmental Protection Agency, Region 7
901 N. 5th Street
Kansas City, Kansas 66101

Re: Solutia Inc. – J. F. Queeny Plant
EPA ID No. MOD 004 954 111
Quarterly Report

Dear Mr. Gulliford:

In accordance with the reporting requirements of Section D of the Corrective Action Schedule of Compliance of Hazardous and Solid Waste Amendments Permit No. MOD 004 954 111 issued November 8, 1989 to Solutia Inc. for its J. F. Queeny Plant, enclosed herewith please find five (5) copies of the quarterly report for the quarter ended December 31, 2004.

Sincerely,

Jerold W. Lebold
Plant Manager

cc: Richard Nussbaum – MDNR
Stephanie Doolan – USEPA



RECEIVED

JAN 18 2005

January 11, 2005

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A handwritten signature in black ink, appearing to read "Jerold W. Lebold", with a large, stylized loop at the end.

Jerold W. Lebold
Plant Manager

HAZARDOUS AND SOLID WASTE AMENDMENTS PERMIT MOD 004 954 111
SOLUTIA - JOHN F. QUEENY PLANT
QUARTERLY REPORT
Report No. 59

Quarter ending: 12/31/04
January 15, 2005

To: U.S. Environmental Protection Agency
Region 7
ART Division/RCRA Permits Section
901 N. 5th St.
Kansas City, Kansas 66101

ACTIVITIES THIS QUARTER

The scopes of work associated with the following work plans continued to be implemented this quarter: *Former Bulk Chemical Storage Area (FBCSA) Work Plan for Additional Characterization*; and *Corrective Measures Study (CMS) work plan*. The work conducted for these plans, during the quarter, is briefly summarized below:

Former Bulk Chemical Storage Area (FBCSA)

- Conducted the third round of periodic groundwater sampling
- Conducted a contemporaneous round of gauging of all wells and temporary piezometers at the FBCSA
- Transducers and data loggers continued to monitor groundwater levels in selected monitoring wells
- Completed data review and validation from the first two rounds of groundwater sampling

CMS

- Completed review and validation of analytical data collected from the former FF Building Area, former Acetanilides Production Area, and VV Building Area, in conjunction with the FBCSA work.

CA-750 Environmental Indicator (EI)

The final EI package was submitted on September 30th. The USEPA reviewed the report and made a YE determination for the EI.

Interim Groundwater Monitoring

On November 18, 2004, MDNR called Solutia to discuss their general expectations regarding groundwater monitoring plans for the facility. Via email, they sent Solutia checklists to be used to develop the plan. The plan will be a component of the upcoming Corrective Action Only Permit.

PROBLEMS/POTENTIAL PROBLEMS/ACTIONS TO RECTIFY

No problems were encountered.

ACTIVITIES PLANNED FOR NEXT QUARTER

The following activities are planned for January through March 2005.

- Periodic groundwater monitoring will be conducted in accordance with the work plans.
- URS will continue to compile field and laboratory information.
- A conference call will be held with USEPA and MDNR on January 4th to discuss progress in developing media cleanup objectives. The media cleanup objectives document will be submitted by January 28, 2005.
- URS will begin developing the report associated with the FBCSA work.
- URS will begin evaluating potential corrective measures based on the results of the data collection activities and the preliminary cleanup objectives.
- Solutia and URS will develop a proposed interim groundwater monitoring plan, as warranted, based on the MDNR's schedule for the Corrective Action Only Permit.